

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,

Plaintiff,

VS.

TRAVELPORT LIMITED, et al.,

Defendants.

Case No. 4:11-cv-00244-Y
(ODD DOCKET LAW CLERK)

JOINT MOTION TO EXTEND DEADLINES

Plaintiff American Airlines, Inc. (“American”), and Defendants Travelport Limited, Travelport, LP, and Orbitz Worldwide, LLC (collectively “Defendants,” and together with American “the Parties”), through their undersigned counsel, jointly move for an extension of certain case deadlines.

In particular, the Parties request that certain deadlines set in the Court’s Order Granting Unopposed Motion to Stay Party Discovery and Extend Current Deadlines and Request for Expedited Treatment [Doc. 420] be modified as follows:

- a) Fact discovery shall be completed by Wednesday, **March 27, 2013.**
- b) Defendants' expert reports shall be due Tuesday, **April 9, 2013.**
- c) Plaintiff's rebuttal expert disclosures shall be due Tuesday, **April 30, 2013.**
- d) Expert depositions shall be completed by Friday, **May 17, 2013.**
- e) All pretrial and dispositive motions, except motions *in limine*, shall be due Friday, **May 31, 2013.**

The requested extension is necessary because of recent developments in the case. For example, certain depositions of key witnesses have not been able to be scheduled until March.

Further, as the Court is aware, Orbitz shut down work by its experts during the various litigation stays (Dkts. 407, 420, 431 and 445).

For the foregoing reasons, the parties jointly request the extension described above to accommodate these recent developments. A proposed form of order is attached.

Dated: February 20, 2013

Respectfully submitted,

/s/ Yolanda C. Garcia

Yolanda C. Garcia
State Bar No. 24012457
Michelle Hartmann
State Bar No. 24032401
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201-6950
214.746.7700
214.746.7777

R. Paul Yetter
State Bar No. 22154200
Anna Rotman
State Bar No. 24046761
YETTER COLEMAN LLP
909 Fannin, Suite 3600
Houston, Texas 77010
713.632.8000
713.632.8002 (fax)

Bill Bogle
State Bar No. 025661000
Roland K. Johnson
State Bar No. 00000084
HARRIS, FINLEY & BOGLE, P.C.
777 Main Street, Suite 3600
Fort Worth, Texas 76102
817.870.8700
817.332.6121 (fax)

/s/ Michael L. Weiner

Michael L. Weiner
michael.weiner@dechert.com
DECHERT LLP
1095 Avenue of the Americas
New York, New York 10036-6797
212.698.3608
212.698.3599 (Fax)

Mike Cowie
mike.cowie@dechert.com
Craig G. Falls
craig.falls@dechert.com
DECHERT LLP
1775 I Street, NW
Washington, D.C. 20006-2401
202.261.3300
202.261.3333 (Fax)

Carolyn H. Feeney
carolyn.feeney@dechert.com
Justin N. Pentz
justin.pentz@dechert.com
DECHERT LLP
2929 Arch Street
Philadelphia, PA 19104
215.994.4000
215.994.2222 (Fax)

Of Counsel:

PAUL HASTINGS LLP

M.J. Moltenbrey
875 15th Street, N.W.
Washington, DC 20005
202.551.1700
202.551.1705 (Fax)

WEIL, GOTSHAL & MANGES LLP

Richard A. Rothman
James W. Quinn
767 Fifth Avenue
New York, New York 10153
212.310.8426
212.310.8285 (fax)

Attorneys for Plaintiff American Airlines, Inc.

/s/ Christopher S. Yates

Christopher S. Yates (admitted Pro Hac Vice)
California State Bar No. 161273
Email: Chris.Yates@lw.com
Daniel M. Wall (admitted Pro Hac Vice)
California State Bar No. 102580
Email: Dan.Wall@lw.com
Brendan A. McShane
California State Bar No. 227501
Email: Brendan.McShane@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111-6538
Telephone: (415) 391-0600
Facsimile: (415) 395-8095

John J. Little
Texas State Bar No. 12424230
Email: jlittle@jpf-law.com
LITTLE PEDERSEN FANKHAUSER LLP
901 Main Street, Suite 4110
Dallas, TX 75202-3714
Telephone: (214) 573-2300
Facsimile: (214) 573-2323

*Attorneys for Defendant
Orbitz Worldwide, LLC*

Faith E. Gay
faithgay@quinnemanuel.com
Steig D. Olson
steigolson@quinnemanuel.com
**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
51 Madison Avenue, 22nd Floor
New York, New York 10010
212.849.7000
212.849.7100 (Fax)

Walker C. Friedman
State Bar No. 07472500
wcf@fsclaw.com
Christian D. Tucker
State Bar No. 00795690
tucker@fsclaw.com
FRIEDMAN, SUDER & COOKE, P.C.
Tindall Square Warehouse No. 1
604 East 4th Street, Suite 200
Fort Worth, Texas 76102
817.334.0400
817.334.0401 (Fax)

John T. Schriver
JTSchriver@duanemorris.com
Paul E. Chronis
pechronis@duanemorris.com
DUANE MORRIS LLP
190 South LaSalle Street, Suite 3700
Chicago, Illinois 60603-3433
312.499.6700
312.499.6701 (Fax)

*Attorneys for Defendants
Travelport Limited and Travelport, LP*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of February, 2013, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, Fort Worth Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Justin N. Pentz
Justin N. Pentz